

From: Dianna Moorman [Dianna.Moorman@jamescitycountyva.gov]
Sent: 2/15/2017 2:27:26 PM
To: Noel Johnson [njohnson@PublicInterestLegal.org]; Nate Green [ngreen@wjcc-ca.hrcoxmail.com]
CC: Shawna Powell [spowell@PublicInterestLegal.org]
Subject: RE: NVRA Request and Litigation Notice
Attachments: Cancellation_Declared_Non_Citizen 2011-2017.pdf

Good afternoon-

My sincerest apologies for not responding sooner. I have attached the requested report of non-citizens in James City County from January 1, 2011-February 15, 2017. Please note that many of these simply were because they failed to check the "Are you a US citizen" box on the voter registration application, not because they are actually a non-citizen, and have since reregistered with an acceptable completed application.

Please let me know if there is anything else I can do for you.

Best regards-

-Dianna Moorman

Please note: our office has moved and all contact info has changed.

Dianna S. Moorman, VREO
General Registrar and Director of Elections



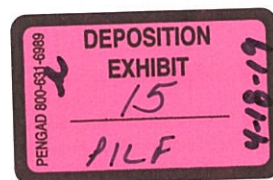
Voter Registration and Elections

5300 Palmer Lane
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jamescitycountyva.gov/vote

From: Noel Johnson [mailto:njohnson@PublicInterestLegal.org]
Sent: Wednesday, February 15, 2017 1:37 PM
To: Dianna Moorman ; Nate Green
Cc: Shawna Powell
Subject: NVRA Request and Litigation Notice

Ms. Moorman,

On August 8, 2016, we sent you a letter seeking inspection of election records pursuant to the National Voter Registration Act. To date, we have not received any of the requested records, including a VERIS report showing cancellations of registrants who were determined to not meet the requirement of U.S. citizenship.



We have attempted several times to discuss this matter with you and to inspect the requested documents, including an in-office visit on September 23, 2016. Most recently, we contacted you on January 31, 2017, informing you that your basis for withholding the noncitizen cancellation report has been rejected by a federal court in the Eastern District of Virginia.

This is our last attempt to resolve this matter prior to litigation. If you do not provide access to the documents requested in our August 8, 2016 letter, we will commence litigation next week by filing the attached Complaint and Exhibits.

Please note: our request is not limited to the noncitizen cancellation report, but includes other documents such as the voter registration applications of all cancelled noncitizens and any records showing the voting history of those noncitizens. Additionally, our request asks for all communications with law enforcement officials regarding those noncitizens. Please refer to the attached Exhibit 1 for the entire scope of our request.

The attorney for James City, as listed on the Commonwealth's Attorney's website, is copied here.

Please follow up immediately with any questions or concerns.

Noel Johnson

Litigation Counsel

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